

Section 11

The working draft permit prohibits the direct discharge of water that contacts the dry dock floor. EPA refers to water that contacts the dry dock floor as “dry dock floor drainage”. Any water that contacts the dry dock floor has the potential to wash contaminants to Sinclair Inlet. The dry dock floor drainage has the highest concentration of contaminants relative to the hydrostatic relief water and ship cooling water. Water at the NPDES sample location is diluted by ship cooling water and hydrostatic relief water. In section 11, PSNS refers to water that contacts the dry dock floor as “potable water.” Potable water is suitable for drinking. Once the potable water contacts the dry dock floor, it is no longer potable.

The AKART study should address these individual “potable” water sources and preventing the water sources from contacting the dry dock floor, by routing the waste streams to discharge directly to the dry dock drainage system so that the water does not come into contact with the dry dock floor. If the water does contact the dry dock floor, the water should be discharged to the sanitary sewer or for treatment. These are small volumes of water, but would contain high concentration of contaminants.

The permit requires that PSNS redirect several wastestreams to discharge directly to the dry dock drainage system so that the water does not come into contact with the dry dock floor. These wastestreams include freeze protection water, ----- . Once a vessel is in a dry dock, its cooling water must be diverted from the dry dock floor prior to industrial operations.

It's not sufficient to simply meet permit limits.

The AKART study

The dirtiest component from the dry docks is dry dock floor drainage. Water at the NPDES sample location is diluted by ship cooling water and hydrostatic relief water. These flows can dilute the dry dock wastestream up to ____ percent. We don't want diluted flows going to Sinclair Inlet.

The draft permit prohibits the direct discharge of water that contacts the dry dock floor. Section 11 of the AKART study refers to water that contacts the dry dock floor as “potable water.” Potable water is drinking water. Any water that contacts the dry dock floor, has the potential to wash contaminants to Sinclair Inlet.

What about other treatment option for the

General Reaction

One of the main pollutant sources that the draft permit addresses is the dry dock floor drainage. The dry dock floor drainage consists of waters that contact the dry dock floor, then flow to the dry dock drainage system. Any waters that come into contact with the dry dock floor come into contact with pollutants on the dry dock floor and have the potential to wash the pollutants from the dry dock floor to the receiving water when the dry dock floor drainage is directly discharged. Stormwater runoff from the dry dock floor is the highest contributor to metal concentrations in the dry dock discharges. Other water sources that make up the dry dock floor drainage include : -----.

The permit addresses the dry dock floor drainage in several ways.

1. The permit requires that the permittee conduct a feasibility analysis of investigating the option of at eliminating the direct discharge of all dry dock floor drainage when industrial operations are occurring. The permit requires that the permittee investigate the option of look into collecting and treating or sending to the sanitary sewer all water that comes onto the dry dock floor during industrial operations.

Despite efforts to thoroughly clean the dry dock floor, they can't

As long as there is direct discharge of water that comes into contact with the dry dock floor during industrial operations, the permit includes the following:

2. Monitoring of the dry dock floor drainage. The permit requires monitoring of the dry dock drainage to characterize it and compare to benchmark levels (refer to Section ____).

Benchmark levels.

The method used by PSNS to diverts flows from Sinclair Inlet may not be accurate "making the decision point" for whether flows are diverted away from Sinclair Inlet. The level at which flows are diverted from The storm water permit shows that BMPs should be around

3. Specific BMPs

The NPDES regulations require that the permit contain effluent limits for water quality and technology.

4. Redirect wastestreams

The permit requires that PSNS redirect several wastestreams to discharge directly to the dry dock drainage system so that the water does not come into contact with the dry dock floor. These wastestreams include freeze protection water, -----). Once a vessel is in a dry dock, its cooling water must be diverted from the dry dock floor prior to industrial operations.

The permit prohibits the direct discharge of several wastestreams these wastestreams must be sent to for treatment or sanitary sewer. These include washwater, freeze protection water, _____) when dry dock. These wastestreams can be diverted to directly discharge the dock dock drainage system, and not come into contact with the dry dock floor.

Several of these wastestream can be redirected so that water does not contact the dry dock floor, or that when the water does contact the dry dock floor, it be directed to the sanitary sewer.

The draft permit prohibits the direct discharge of water that contacts the dry dock floor. PSNS refers to water that contacts the dry dock floor as “potable water.” Any water that contacts the dry dock floor, has the potential to wash contaminants to Sinclair Inlet.

The dirtiest component from the dry docks is dry dock floor drainage. Water at the NPDES sample location is diluted by ship cooling water and hydrostatic relief water. These flows can dilute the dry dock wastestream up to ____ percent. We don’t want diluted flows going to Sinclair Inlet.

=====
vii It’s not true that a requirement of the NPDES renewal process is to conduct an AKART study.

Proposed Resolution 1. We need to have the dilution available following implementation of AKART for this to happen.

Solution 1 – Have final limits based on dilution available once implementation of AKART.

Proposed Resolution 2. No. The NPDES regs require that we look at both technology-based and WQBELs. The permit has what EPA considers to be appropriate BMPs. If PSNS has comments on specific BMPs, PSNS should tell us. We are telling what we want. We don't approve SWPPP. Could have a situation in which a practice occurs in the dry dock, that is not appropriate, but is not detected because it is diluted with groundwater and ship cooling water.

Solution 2– Explain this in the fact sheet.

Page 3 of 4. Proposed Resolution 3. We are requiring them to do a feasibility study for compliance. Need to submit it. Keep hearing. We can't do this. What can they do? Dry docks are already set up to collect the dry dock drainage. Need to identify the highly contaminated storm water areas and come up with a solution. Need this feasibility study. Need identification of contaminated storm water areas. Need time line from them. Need concrete information not just, we can't do this.

Solution 3. Longer time frame for coming into limits than 5 years.

Proposed Resolution 4. I will take a look at the sampling required. Don't want to do things under the framework of ENVVEST. Need to issue the permit. The permit identifies specific sampling. They can propose what they want to do. Need to characterize the wastestreams.

Proposed Resolution 5.

Difference between AKART and Permit Condition

Page 23. It's not clear why PSNS did not include chlorine as a pollutant of concern. PSNS adds chlorine to the cooling water system (reference letter, _____). The permit includes chlorine limits.

Page 25. Table 6-4. They address metal cutting only outside of the dry docks. Doesn't metal cutting occur in the dry docks? Similarly, painting only addressed in the dry docks, do painting operations occur outside of the dry docks?

Page 59. The working draft permit requires that the permittee investigate collecting all waters that contact the dry dock floor and either sending the flows to the sanitary sewer system or providing on-site treatment. Any water that contact the dry dock floor have the potential to wash contaminants to Sinclair Inlet. The AKART doesn't fully address these wastestreams. Page 59 states that the only water discharged in Sinclair Inlet through the dry dock outfalls is single-pass non-contact cooling, potable, hydrostatic relief groundwater, and some rain water. The waters that contact the dry dock floor are not potable – potable water is water that is suitable for drinking.

Potable water is drinking water. They are

Section 11. There are certain practices that occur in the dry docks. Minimizing dry dock flows, flows that are coming into contact with contaminants. Preventing practices from occurring in the dry docks. The draft permit doesn't regulate based on turbidity.

Figure 6. The scale on this figure renders it useless for the permit – 0 to 2,000 ppb. The permit includes a benchmark level of 20 ppb for copper. Although difficult to discern from the scale of the figure, it appears there is little correlation between turbidity and copper in this lower range. Based on the line drawn, it appears that any turbidity greater than 1 NTU should be directed to the sanitary sewer or collected and treated.

is worthless.

AKART Study Dry Dock

washdown water,

- freeze protection water that contacts the dry dock floor,
- contaminated storm water that exceeds water quality standards,
- ballast water while a ship is in the dry dock

Washwater such as this that contacts the dry dock floor during dry periods will be more concentrated. The AKART study doesn't address this. Doesn't address this.

Section 12.5

Once the cooling water exits the vessels in dry dock it is routed via temporary hoses to the dry dock drainage system to prevent contact with debris on the dry dock floor. PSNS&IMF Instruction P5090.30 requires the cooling water to be routed to the dry dock drainage system within one week of docking a vessel.

It's unclear why this can't be part of the permit. The permit prohibits the discharge of cooling water to the dry dock floor.

BMP just requires that within one week/two week. The permit will require that cooling water be routed to the dry dock drainage to prevent contact debris prior to commencement of activities in the dry dock.

Pages 82 to 85 Section 13 How do these areas compare to areas identified in the permit. need to sample.

Page 91. I thought Bruce told me that the entire stormwater system had been cleaned and TV'd. Need to clarify.

Table A8-1

BMPs that are in the working draft permit, that are not incorporated into the new BMPs. Can't delete – part of AKART. If there are issues with the BMPs in the final permit, need to address.

I am still reviewing the comments on the draft permit. To the extent that the permits contains BMP, if the AKART study and revised BMPs do not incorporate the BMPs in the wdp, could be short sighted.

II.c.2.b(1)(b)	Can't have washwater in industrial areas to Sinclair Inlet. See also PSNS comment no. 6.
II.c.2.b(1)(d)	OK.
II.c.2.b(3)(d)	OK. Overwater work.
II.c.2.b(3)(g)	OK to delete

II.c.2.b(3)(i)	This applies to non-dry dock areas.
II.c.2.b(5)(e)	I'm OK with not having this.
II.c.2.b(7)	Problem? The BMPs do not address fueling areas.
II.c.2.b(8)(e)	I disagree with note "C". Section 12 does not look at individual wastestreams.
II.c.2.c(1)	Problem – this should be included in the non-dry dock areas as well.
II.c.2.c(2)	OK not to include with dry docks.
II.c.2.c(3)	OK not to include with dry docks.
Outdoor metal work	I need to add this.

Permit comments that need addressing:

62	
80	No. can't remove the requirement. What is 5090.30 App. E?
81	Less protective??? Need to elaborate
82	Less protective??? Need to elaborate
83	No. Need to look at conveying stormwater to sanitary sewer.
84	Need to sample water coming for the dry dock floor. Not convinced it's unnecessary. Just because it's routed through the PWCS, it doesn't mean that it's dealt with appropriately.

62.

Need to emphasize that the permittee must meet technology based effluent limits and WQBELs.

Comparison to AKART standard. I need to compare to those that do not meet the WQBELs.

They need to understand the sequence of events.

Get a mixing zone. They will have WQBELs for stormwater. They need to collect and treat any stormwater that exceeds those limits.

5/23/08 Letter	Nov 08 Letter	Issue	Discussion	Revision
1				Edit Made to Permit and Fact Sheet
2	1	Compliance Schedule		Edit Made
	2	Table of Content		Edit Made
3				Edit Made
4	3	Prohibited Discharge	Ask Jeanne/Mike/UNDS report TDD	Revise to prohibit ballast water that contacts the dry dock floor, ballast water with oil. Prohibit washdown water once commencement of operations. No change to freeze protection. Contaminated storm water.
	4	Uncontaminated groundwater relief	Not sure about this. I have not seen a characterization of this groundwater. Have they done a priority pollutant scan on just the groundwater without	Pending

			cooling. What would they do with this information.	
	5	UNDs Discharges	Need to investigate UNDs. Wouldn't discharges authorized under UNDs not be addressed by this permit?	Pending
5			Need written explanation from PSNS on this request. I need to include additional language under "Wastestreams Discharging to Dry Dock Outfalls" in the Fact Sheet" that describes the generation of this wastestream. What outfalls does the bay silt discharge from?	JD. Revise condition. "Before working on the ship, they should thoroughly clean the dry dock. Not sample those discharges."
6			The permit can't allow for water that freeze protection water that contacts the dry dock floor to be discharged directly to Puget Sound. PSNS must diverted to from the floor.	JD. JD concurs. Need pollution prevention to prevent the freeze protection water from getting polluted in the first place.
7			Need additional information on "single-pass cooling water"	JD. It's not listed as a prohibited discharge.
8			Look at the 1994 permit and requirement for	
9			Would need to prohibit discharge from those	

			outfalls	
10			What is the basis of why we need this information. Talk to Jean – she wanted gw sampling initially. What will we do with this information.	JD. Look at sand & gravel permit language. We are looking at worse case discharge. Look at Pugla in Bellingham. Or the Fishing Vessel (FVO) permit.
11			No Edit. RP was done.	
12			No Edit. Add basis for why only composite sample.	
13			Still not clear why the cooling has to come in contact with the dry dock floor. Add requirement to not come in contact with the dry dock floor?	JD. They need to alter their procedures. Revise permit. Prior to doing any hull work, they need to have the cooling water hooked up to the drainage.
14			If the dry dock floor is discharged to the sewer, then no sampling is required. Need to add basis for the sampling in the fact sheet. If water is coming into contact with the dry dock floor and discharging to the sound, then need to sample. This water is acting like wash water and washing pollutants to the sound. Should be collected.	KC

15			Need to collect representative samples of the stormwater. Can't just say "that's not practical." EPA has identified that these are problem areas. Need to propose something. Add something about the use of tide gates? Talk to Misha.	JD. Add provision. When the tide is out, they need to sample. (SP: What about tide gates??)
16			PSNS thinks it is too confusing to note which wastestreams are contributing to the sample. Seems like it would be even more confusing to know whether a particular cooling water is injecting chlorine.	No change. Look at letter again from the shipyard.
17			I think the wording is fine, but if the shipyard doesn't like it, I'll revise it.	Changed it to: "The permittee must complete the interim tasks:"
18				Changed numbering some wording. Fixed for both compliance schedules.
19				Work on that
20				I deleted that sentence. Done
21				Ask KC, Jean Tran. Chlorine has a limit.
22				No change
23				Regulation. See 40 CFR ____

24				Need updated list of all outfalls from Bruce.
25				Need updated list of all outfalls from Bruce.
26				No Change
27				Added a sentence that the permit covers also the steam plant. Need updated list from Bruce Beckwith.
28				Done
29				Done
30			Need to add words.	JD concurs. Can't discharge to come into contact with the dry dock floor.
31			NO. I don't want to change.	JD concurs. Can't discharge to come into contact with the dry dock floor.
32				I revised sentence.
33				Need update from PSNS. JD. Add description. The permittee must hook up the cooling water to bypass the dry dock floor before commencing any hull work.
34				Need update from PSNS
35			I deleted this paragraph, since monitoring/reporting falls under the existing permit conditions.	Done

36			Deleted sentence.	Done.
37			NO.	JD concurs.
38				Need update from PSNS
39			NO	No change
40				Done
41			Be specific	
42				Done
43			Yes you do.	Refer to letter.
44				How do they know on a daily basis how much flow is sent to Bremerton? Add additional

11/17/08 Need to double check and add to the fact sheet of Why we do not want the wash water from contacting the dry dock floor.